

United States District Court **FILED**

FOR THE
NORTHERN DISTRICT OF CALIFORNIA
CRIMINAL DIVISION
VENUE: SAN FRANCISCO

MAY 24 2005
RICHARD WIEKING
CLERK, U.S. DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

RAYMON D. HILL a/k/a "Money Ray,"
DENNIS CYRUS, Jr. a/k/a "Daddy-O,"
AQUIL H. PETERSON a/k/a "Quil,"
LESTER W. HOGAN a/k/a "Styles,"
STEVE WILSON
a/k/a "Wolf," a/k/a "Solo,"
DONALD J. ARMOUR a/k/a "DJ,"
MISTER MEILLEUR a/k/a "Mister,"

DEFENDANT.

INDICTMENT

See Record of Grand Jurors Concurring Attachment

CR 05 00324 MMC

A true bill.

Mary C McDonald
Foreman

Filed in open court this 24th day of

May 2005

Clerk

Elynn D. Lyons
Bail, \$ no bail arrest warrants except
for Hill who is in BOP custody · ZNC

**Record of Grand Jurors Concurring Attachment
Raymon D. Hill**

21 U.S.C. § 846-Conspiracy to Possess with Intent tp Distribute and Distribute 50 Grams or More of Cocaine Base;
18 U.S.C. § 1962(d)- Conspiracy to Participate in a Racketeer Influenced and Corrupt Organization; 18 U.S.C. § 1959- Violent Crime in Aid of Racketeering;
21 U.S.C. § 841 (a)(1)- Possession with Intent to Distribute, and Distribution of Cocaine Base;
21 U.S.C. § 860(a)- Possession for Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a Public Housing Facility and a Playground;
18 U.S.C. § 924(c)(1)(A) & (iii)- Using, Carrying and Possessing Firearm During and in Relation to Crime of Violence;
18 U.S.C. § 1512(a)(1)(A) & (C)- Witness Murder;
18 U.S.C. § 1513(a)(1)(A) & (B)- Witness Retaliation;
18 U.S.C. § 1503(a)- Obstruction of Justice; 18 U.S.C. § 2- Aiding and Abetting.

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Penalty Sheet Attachment

- Petty
 Minor
 Misde-mnior
 Felony

PENALTY:

See Penalty Sheet Attachment

PR [REDACTED]

Name of Complainant Agency, or Person (&Title, if any)

FBI SA Brian Gilhooly

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM

KEVIN V. RYAN

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

PHILIP J. KEARNEY

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

SAILED**DEFENDANT - U.S.****MAY 24 2005****LESTER W. HOGAN****DISTRICT COURT NUMBER**

RICHARD W. MURKIN
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CR 05 00324**DEFENDANT****MMC****IS NOT IN CUSTODY**

- Has not been arrested, pending outcome this proceeding.
- 1) If not detained give date any prior summons was served on above charges
 - 2) Is a Fugitive
 - 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction
 - 6) Awaiting trial on other charges } Fed'l State
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY This report amends AO 257 previously submitted**PROCESS:**

SUMMONS NO PROCESS* WARRANT Bail Amount: No Bail

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**PENALTY SHEET ATTACHMENT
LESTER W. HOGAN**

COUNT 1:

Conspiracy to Possess with Intent to Distribute and to Distribute 50 Grams or More of Cocaine Base
(21 U.S.C. § 846 & 841(b)(1)(A)(iii))

Maximum Penalty: 10 years to life; \$4 million fine; at least 5 years supervised release; \$100 special assessment

COUNT 2:

Conspiracy to Participate in a Racketeer Influenced and Corrupt Organization
(18 U.S.C. § 1962(d))

Maximum Penalty: 20 years; \$250,000 fine; 3 years supervised release; \$100 special assessment

COUNTS 3-4, 5, 14, 18:

Violent Crime in Aid of Racketeering:
(18 U.S.C. § 1959)

(Cts. 3-4, 14, 18 [§ 1959(a)(5)]; 5 [§ 1959(a)(3)])

Maximum Penalty:

§ 1959(a)(3): [assault with a dangerous weapon]: 20 years; \$250,000; 3 years supervised release; \$100 special assessment

§ 1959(a)(5): [attempting/conspiring to commit murder]: 10 years; \$250,000; 3 years supervised release; \$100 special assessment

COUNTS 27, 34 :

Using, Carrying and Possessing a Firearm During and in Relation to a Crime of Violence
(18 U.S.C. § 924(c)(1)(A))

Maximum Penalty: Mandatory consecutive sentence of at least 5 years in prison; \$250,000 fine; 3 years supervised release; \$100 special assessment

[For a second conviction, mandatory consecutive sentence of 25 years in prison]

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Penalty Sheet Attachment

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY:

See Penalty Sheet Attachment

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)

FBI SA Brian Gilhooly

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

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MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM

KEVIN V. RYAN

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

PHILIP J. KEARNEY

PROCESS:

SUMMONS NO PROCESS*

WARRANT Bail Amount: No Bail

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Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

FILED

DEFENDANT - U.S.

RAYMON D. HILL

MAY 24 2005

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA

CR 05 00324 MMC

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IS IN CUSTODY

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- } Fed'l State

If answer to (6) is "Yes", show name of institution

North County Jail (awaiting designation by BOP)

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST Month/Day/Year

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Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Comments:

SUMMONS NO PROCESS*

WARRANT Bail Amount: No Bail

If Summons, complete following:

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Defendant Address:

**PENALTY SHEET ATTACHMENT
RAYMOND D. HILL**

COUNT 1:

**Conspiracy to Possess with Intent to Distribute and to Distribute 50 Grams or More of Cocaine Base
(21 U.S.C. § 846 & 841(b)(1)(A)(iii))**

Maximum Penalty: 10 years to life; \$4 million fine; at least 5 years supervised release; \$100 special assessment

COUNT 2:

**Conspiracy to Participate in a Racketeer Influenced and Corrupt Organization
(18 U.S.C. § 1962(d))**

Maximum Penalty: 20 years; \$250,000 fine; 3 years supervised release; \$100 special assessment

COUNTS 3-4, 14, 18:

**Violent Crime in Aid of Racketeering:
(18 U.S.C. § 1959)**

**(Cts. 3-4, 14, 18 [§ 1959(a)(5)];
5 [§ 1959(a)(3)])**

Maximum Penalty:

§ 1959(a)(3): [assault with a dangerous weapon]: 20 years; \$250,000; 3 years supervised release; \$100 special assessment

**§ 1959(a)(5): [attempting/conspiring to commit murder]: 10 years;
\$250,000; 3 years supervised release; \$100 special assessment**

COUNT 35:

**Obstruction of Justice
18 U.S.C. § 1503**

**Maximum Penalty: 10 years in prison; \$250,000 fine; 3 years supervised release;
\$100 special assessment**

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Penalty Sheet Attachment

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY:

See Penalty Sheet Attachment

PROCEEDING

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FBI SA Brian Gilhooly

person is awaiting trial in another Federal or State Court, give name of court

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MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM

KEVIN V. RYAN

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

PHILIP J. KEARNEY

Name of District Court, and/or Judge/Administrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

MAY 24 2005

DENNIS CYRUS, JR.

RICHARD CLERK U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

DISTRICT COURT NUMBER

CR 05 00324**DEFENDANT****MMC****IS NOT IN CUSTODY**

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IS IN CUSTODY

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- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes", show name of institution

San Francisco County Jail

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount: No Bail

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Arraignment Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**PENALTY SHEET ATTACHMENT
DENNIS CYRUS, JR.**

COUNT 1:

**Conspiracy to Possess with Intent to Distribute and to Distribute 50 Grams or More of Cocaine Base
(21 U.S.C. § 846 & 841(b)(1)(A)(iii))**

Maximum Penalty: 10 years to life; \$4 million fine; at least 5 years supervised release; \$100 special assessment

COUNT 2:

**Conspiracy to Participate in a Racketeer Influenced and Corrupt Organization
(18 U.S.C. § 1962(d))**

Maximum Penalty: 20 years; \$250,000 fine; 3 years supervised release; \$100 special assessment

COUNTS 6, 7, 8-11:

**Violent Crime in Aid of Racketeering:
(18 U.S.C. § 1959)**

(Cts. 6 [§ 1959(a)(5)], 7 [§ 1959(a)(3)]; 8-11 [§ 1959(a)(1)])

Maximum Penalty:

**§ 1959(a)(1): [murder]: the death penalty, or life imprisonment and/or \$250,000; \$100 special assessment
[kidnaping]: life imprisonment and/or \$250,000; \$100 special assessment**

§ 1959(a)(3): [assault with a dangerous weapon]: 20 years; \$250,000; 3 years supervised release; \$100 special assessment

§ 1959(a)(5): [attempting/conspiring to commit murder]: 10 years; \$250,000; 3 years supervised release; \$100 special assessment

COUNT 12:

Witness Murder
(18 U.S.C. § 1512(a)(1)(A) & (C))

Maximum Penalty: Life imprisonment, or the death penalty.

COUNT 13:

Witness Retaliation
(18 U.S.C. § 1513(a)(1)(A) & (B))

Maximum Penalty: Life imprisonment, or the death penalty.

COUNT 25:

Possession of Cocaine Base with Intent to Distribute
(21 U.S.C. §§ 841(a)(1) & (b)(1)(B)(iii))

Maximum Penalty:
5 to 40 years in prison; \$2 million fine; at least 4 years supervised release; \$100 special assessment

COUNT 26:

Possession of Cocaine Base with Intent to Distribute, Within One Thousand Feet of a Public Elementary School, a Public Housing Facility, and a Playground
(21 U.S.C. § 860(a))

Maximum Penalty: Twice the maximum punishment authorized by § 841(b); at least twice the supervised release authorized by § 841(b) for a first offense; a fine of up to twice that authorized by § 841(b)

COUNTS 28-31 :

Using, Carrying and Possessing a Firearm During and in Relation to a Crime of Violence
(18 U.S.C. § 924(c)(1)(A))

Maximum Penalty: Mandatory consecutive sentence of at least 5 years in prison; \$250,000 fine; 3 years supervised release; \$100 special assessment
[For a second conviction, mandatory consecutive sentence of 25 years in prison]

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Penalty Sheet Attachment

- Petty
 Minor
 Misde-monor
 Felony

PENALTY:

See Penalty Sheet Attachment

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)

FBI SA Brian Gilhooly

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

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U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on THIS FORM

KEVIN V. RYAN

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

PHILIP J. KEARNEY

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount: No Bail

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

FILED

DEFENDANT - U.S.

AQUIL H. PETERSON

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA

MAY 24 2005

CR 05 00324

DEFENDANT

MMC

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
- 1) If not detained give date any prior summons was served on above charges
 - 2) Is a Fugitive
 - 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction
 - 6) Awaiting trial on other charges
- } Fed'l State
- If answer to (6) is "Yes", show name of institution

San Francisco County Jail

Has detainer been filed? Yes No } If "Yes" give date filed

Month/Day/Year

DATE OF ARREST

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

**PENALTY SHEET ATTACHMENT
AQUIL H. PETERSON**

COUNT 1:

**Conspiracy to Possess with Intent to Distribute and to Distribute 50 Grams or More of Cocaine Base
(21 U.S.C. § 846 & 841(b)(1)(A)(iii))**

Maximum Penalty: 10 years to life; \$4 million fine; at least 5 years supervised release; \$100 special assessment

COUNT 2:

**Conspiracy to Participate in a Racketeer Influenced and Corrupt Organization
(18 U.S.C. § 1962(d))**

Maximum Penalty: 20 years; \$250,000 fine; 3 years supervised release; \$100 special assessment

COUNTS 8, 9:

**Violent Crime in Aid of Racketeering:
(18 U.S.C. § 1959)**

Maximum Penalty:

§ 1959(a)(5): [attempting/conspiring to commit murder]: 10 years; \$250,000; 3 years supervised release; \$100 special assessment

COUNTS 19, 23:

**Possession of Cocaine Base with Intent to Distribute
(21 U.S.C. §§ 841(a)(1) & (b)(1)(B)(iii) or (b)(1)(C))**

**Maximum Penalty (§ 841(b)(1)(C) [Peterson, Ct. 19]):
20 years in prison; \$1 million fine; at least 3 years supervised release; \$100 special assessment**

**Maximum Penalty (§ 841(b)(1)(B)(iii) [Peterson, Ct. 23]):
5 to 40 years in prison; \$2 million fine; at least 4 years supervised release; \$100 special assessment**

COUNTS 20, 24:

**Possession of Cocaine Base with Intent to Distribute, Within One Thousand Feet of
a Public Elementary School, a Public Housing Facility, and a Playground
(21 U.S.C. § 860(a))**

Maximum Penalty: Twice the maximum punishment authorized by § 841(b); at least twice the supervised release authorized by § 841(b) for a first offense; a fine of up to twice that authorized by § 841(b)

COUNT 29 :

**Using, Carrying and Possessing a Firearm During and in Relation to a Crime of
Violence
(18 U.S.C. § 924(c)(1)(A))**

Maximum Penalty: Mandatory consecutive sentence of at least 5 years in prison;
\$250,000 fine; 3 years supervised release; \$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Penalty Sheet Attachment

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY:

See Penalty Sheet Attachment

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)

FBI SA Brian Gilhooly

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:

U.S. Atty Defense

this prosecution relates to a pending case involving this same defendant

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

Name and Office of Person Furnishing Information on THIS FORM

KEVIN V. RYAN

U.S. Atty Other U.S. Agency

Name of Asst. U.S. Atty (if assigned)

PHILIP J. KEARNEY

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

FILED

DEFENDANT - U.S.

STEVE WILSON

RICHARD M. WIEKING
CLERK, U.S. DISTRICT COURT,
NORTHERN DISTRICT OF CALIFORNIA

MAY 24 2005

CR 05 00324

DEFENDANT

MMC

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
- 1) If not detained give date any prior summons was served on above charges
 - 2) Is a Fugitive
 - 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction
 - 6) Awaiting trial on other charges
- } Fed'l State

If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST → Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount: No Bail

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**PENALTY SHEET ATTACHMENT
STEVE WILSON**

COUNT 1:

**Conspiracy to Possess with Intent to Distribute and to Distribute 50 Grams or More of Cocaine Base
(21 U.S.C. § 846 & 841(b)(1)(A)(iii))**

Maximum Penalty: 10 years to life; \$4 million fine; at least 5 years supervised release; \$100 special assessment

COUNT 2:

**Conspiracy to Participate in a Racketeer Influenced and Corrupt Organization
(18 U.S.C. § 1962(d))**

Maximum Penalty: 20 years; \$250,000 fine; 3 years supervised release; \$100 special assessment

COUNTS 14-17, 16:

**Violent Crime in Aid of Racketeering:
(18 U.S.C. § 1959)
(Cts. 14, 15, 17 [§ 1959(a)(5)]; 16 [§ 1959(a)(3)])**

Maximum Penalty:

§ 1959(a)(3): [assault with a dangerous weapon]: 20 years; \$250,000; 3 years supervised release; \$100 special assessment

§ 1959(a)(5): [attempting/conspiring to commit murder]: 10 years; \$250,000; 3 years supervised release; \$100 special assessment

COUNTS 32, 33 :

**Using, Carrying and Possessing a Firearm During and in Relation to a Crime of Violence
(18 U.S.C. § 924(c)(1)(A))**

**Maximum Penalty: Mandatory consecutive sentence of at least 5 years in prison; \$250,000 fine; 3 years supervised release; \$100 special assessment
[For a second conviction, mandatory consecutive sentence of 25 years in prison]**

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Penalty Sheet Attachment

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY:

See Penalty Sheet Attachment

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)

FBI SA Brian Gilhooley

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprocution of charges previously dismissed which were dismissed on motion of:
 U.S. Att'y Defense
 this prosecution relates to a pending case involving this same defendant
 prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on THIS FORM

KEVIN V. RYAN

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

PHILIP J. KEARNEY

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount: No Bail

If Summons, complete following:

Arraignment Initial Appearance

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*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

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Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

DONALD J. ARMOUR

DISTRICT COURT NUMBER

MAY 24 2005
 RICHARD W. WILKINS
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

CR 05 00324
DEFENDANT

IS NOT IN CUSTODY

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This report amends AO 257 previously submitted

**PENALTY SHEET ATTACHMENT
DONALD J. ARMOUR**

COUNT 1:

**Conspiracy to Possess with Intent to Distribute and to Distribute 50 Grams or More of Cocaine Base
(21 U.S.C. § 846 & 841(b)(1)(A)(iii))**

Maximum Penalty: 10 years to life; \$4 million fine; at least 5 years supervised release; \$100 special assessment

With two or more prior felony drug convictions (Armour): Mandatory life in prison

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Penalty Sheet Attachment

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY:

See Penalty Sheet Attachment

[REDACTED]
[REDACTED]

PROCEEDING

Name of Complainant Agency, or Person (&Title, if any)

FBI SA Brian Gilhooly

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

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Name of Asst. U.S. Att'y (if assigned)

PHILIP J. KEARNEY

Name of District Court, and/or Judge/Magistrate Location
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FILED

MAY 24 2005

DISTRICT COURT NUMBER

RICHARD W. WILKINSON
 CLERK, U.S. DISTRICT COURT,
 NORTHERN DISTRICT OF CALIFORNIA

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Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

Month/Day/Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT Bail Amount: No Bail

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

**PENALTY SHEET ATTACHMENT
MISTER MEILLEUR**

COUNT 1:

**Conspiracy to Possess with Intent to Distribute and to Distribute 50 Grams or More of Cocaine Base
(21 U.S.C. § 846 & 841(b)(1)(A)(iii))**

Maximum Penalty: 10 years to life; \$4 million fine; at least 5 years supervised release; \$100 special assessment

With one prior felony drug conviction (Wilson, Meilleur): 20 years to life; \$8 million fine; at least 10 years supervised release; \$100 special assessment

COUNT 21:

**Possession of Cocaine Base with Intent to Distribute
(21 U.S.C. §§ 841(a)(1) & (b)(1)(C))**

**Maximum Penalty (§ 841(b)(1)(C):
20 years in prison; \$1 million fine; at least 3 years supervised release; \$100 special assessment**

With a prior felony drug conviction [Meilleur, Ct. 21]: 30 years in prison; \$2 million fine; at least 6 years supervised release; \$100 special assessment

COUNT 22:

**Possession of Cocaine Base with Intent to Distribute, Within One Thousand Feet of a Public Elementary School, a Public Housing Facility, and a Playground
(21 U.S.C. § 860(a))**

Maximum Penalty: Twice the maximum punishment authorized by § 841(b); at least twice the supervised release authorized by § 841(b) for a first offense; a fine of up to twice that authorized by § 841(b)

1 KEVIN V. RYAN (CSBN 118321)
2 United States Attorney
3
4
5
6
7

FILED

MAY 24 2005

RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

MMC

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 **RAYMON D. HILL**

15 a/k/a "Money Ray,"

16 **DENNIS CYRUS, Jr.**

17 a/k/a "Daddy-O,"

18 **AQUIL H. PETERSON**

19 a/k/a "Quil,"

20 **LESTER W. HOGAN**

21 a/k/a "Styles,"

22 **STEVE WILSON**

23 a/k/a "Wolf," a/k/a "Solo,"

24 **DONALD J. ARMOUR**

25 a/k/a "DJ,"

26 **MISTER MEILLEUR**

27 a/k/a "Mister,"

28 Defendants.

}
VIOLATIONS: 21 U.S.C. § 846 – Conspiracy to Possess with Intent to Distribute and Distribute 50 Grams or More of Cocaine Base; 18 U.S.C. §1962(d) – Conspiracy to Participate in a Racketeer Influenced and Corrupt Organization; 18 U.S.C. § 1959 – Violent Crime in Aid of Racketeering; 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute, and Distribution of, Cocaine Base; 21 U.S.C. § 860(a) – Possession for Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a Public Housing Facility and a Playground; 18 U.S.C. § 924(c)(1)(A) & (iii) – Using, Carrying and Possessing Firearm During and in Relation to Crime of Violence; 18 U.S.C. § 1512(a)(1)(A) & (C) – Witness Murder; 18 U.S.C. § 1513(a)(1)(A) & (B) – Witness Retaliation; 18 U.S.C. § 1503(a) – Obstruction of Justice; 18 U.S.C. § 2 – Aiding and Abetting.

SAN FRANCISCO VENUE

INDICTMENT

1 The Grand Jury charges:

2 **COUNT ONE:** (21 U.S.C. § 846 – Conspiracy to Distribute and Possess with Intent to
3 Distribute 50 Grams or More of Cocaine Base)

4 **NARCOTICS CONSPIRACY**

5 A. The Conspiracy

6 From in or about some time no later than 1994, the exact date being unknown to
7 the Grand Jury, and continuing thereafter up to and including May 2005, in the Northern
8 District of California and elsewhere, the defendants,

9 **RAYMON D. HILL**
10 a/k/a "Money Ray,"
11 **DENNIS CYRUS, Jr.,**
12 a/k/a "Daddy-O,"
13 **AQUIL H. PETERSON**
14 a/k/a "Quil,"
15 **LESTER W. HOGAN**
16 a/k/a "Styles,"
17 **STEVE WILSON**
18 a/k/a "Wolf," a/k/a "Solo,"
19 **DONALD J. ARMOUR**
20 a/k/a "DJ"
21 **MISTER MEILLEUR**
22 a/k/a
"Mister,"

23 and others known and unknown to the Grand Jury, knowingly and intentionally conspired
24 to possess with intent to distribute and to distribute a Schedule II controlled substance, to
25 wit: mixtures and substances containing a detectable amount of cocaine base, a Schedule
26 II narcotic controlled substance, and the quantity of said mixtures and substances was
27 fifty (50) grams or more, in violation of Title 21, United States Code, Sections 846 and
28 841(b)(1)(A)(iii).

29 B. Goals of the Conspiracy

30 The conspiracy had the following goals and objectives:

31 (1) It was a principal goal of the conspiracy for the defendants and co-
32 conspirators to obtain as much money and other things of value as possible through the
33 trafficking of a controlled substance, namely cocaine base, also known as crack cocaine,
34

1 in the Northern District of California.

2 (2) It was a further goal of the conspiracy to commit acts of assault, attempted
3 murder, murder and other acts of violence for the following purposes, among others: to
4 enrich the members of the conspiracy; to create, maintain and control a market place for
5 the distribution of its controlled substances; to enforce discipline among members of the
6 conspiracy; to collect monies owed to members of the conspiracy; to protect the
7 conspiracy and its members from detection, apprehension and prosecution by law
8 enforcement; to intimidate and prevent persons from testifying as witnesses in criminal
9 prosecutions against members of the conspiracy; to prevent, thwart, and retaliate against
10 acts of violence perpetrated by rivals against the conspiracy and its members; and to
11 promote and enhance the reputation and standing of the conspiracy and its members.

12 C. Ways, Manner and Means To Accomplish the Conspiracy

13 The ways, manner and means by which the defendants and co-conspirators
14 operated their illegal drug trafficking organization, included, but are not limited to, the
15 following:

16 (1) The members of the conspiracy knowingly and intentionally distributed and
17 possessed with intent to distribute cocaine base, and aided and abetted such distribution
18 and possession with intent to distribute. The locations at which members of the
19 conspiracy conducted their illegal narcotics business included generally the city of San
20 Francisco, but with specific emphasis on the area in and around the Page Street public
21 housing complex, in San Francisco's Western Addition or Fillmore District
22 neighborhood, including, but not limited to, an area bounded by Buchanan Street to the
23 East, Fillmore Street to the West, Page Street to the North and Haight Street to the South.

24 (2) It was part of the conspiracy that the defendants would and did play
25 different roles in the conspiracy, take upon themselves different tasks and participate in
26 the conduct of the organization through various criminal acts. The defendants made
27 themselves and their services available at various times throughout the life of the
28 conspiracy and participated in certain drug trafficking ventures as required to promote

1 and protect the distribution operation. The roles assumed by some defendants were
2 interchangeable at various times throughout the conspiracy. Some of the roles assumed
3 and carried out by the defendants included, among others, holder, lookout, supplier of
4 drugs, organizer, enforcer, protector and street seller.

5 (3) It was further part of the conspiracy that cocaine base was stored, prior to
6 distribution to customers, in and around designated "stash" locations. The defendants
7 used these "stash" locations to store both cocaine base and weapons in order to prevent
8 their being found by the police or rivals, and to hide the items' connection to members of
9 the conspiracy. Some of these "stash" locations were also used for processing, cutting,
10 packaging, and distributing the organization's cocaine base.

11 (4) It was further part of the conspiracy that the defendants and co-conspirators
12 used telephones, including cellular and portable telephones, and beepers/pagers to
13 facilitate their illegal narcotics business; that is, making telephone calls to communicate
14 with each other, their suppliers and their customers, to direct or facilitate acts of violence
15 in furtherance of the conspiracy (including acts of violence against rivals), and to protect
16 against the detection of the conspiracy by law enforcement officials.

17 (5) It was further part of the conspiracy that the defendants and co-conspirators
18 possessed, carried and used firearms, including semi-automatic pistols and revolvers, to
19 protect their drug trafficking operation from theft, robbery and competition from rival
20 sellers, and to do violence in furtherance of the conspiracy. These weapons were
21 possessed, carried and used for various reasons, including, but not limited to: ensuring
22 the personal safety of the members of the conspiracy; protecting the conspiracy's illegal
23 drugs, and the proceeds of drug distribution; intimidating rival drug dealers to keep them
24 from distributing illegal drugs in the area of San Francisco, California that the conspiracy
25 claimed to control; retaliating against real and perceived threats to the general reputation
26 and respect of the conspiracy by outsiders; and ensuring that drug distribution activities
27 within the area of San Francisco, California that the conspiracy claimed to control, were
28 controlled by the defendants and their co-conspirators.

1 and an unindicted co-conspirator, did unlawfully and knowingly commit the crime of
2 maiming on Randy Minor, in violation of California Penal Code Sections 203.
3

4 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(2).
5

6 **COUNT SIXTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in
7 Aid of Racketeering)

8 The defendant named below committed the following violent crime in aid of
9 racketeering activity:
10

11 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
12 fully described in Count Two of this Indictment, which are re-alleged and incorporated by
13 reference as though set forth fully herein, constituted an enterprise as defined in Title 18,
14 United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact
15 which was engaged in, and the activities of which affected, interstate and foreign
16 commerce.

17 (2) At all times relevant to this Indictment, the above-described enterprise,
18 through its members and associates, engaged in racketeering activity as defined in Title
19 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
20 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
21 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
22 841 and 846, and acts involving murder, in violation of California Penal Code Sections
23 187(a), 189 and 664.

24 (3) On or about August 26, 2004, in the Northern District of California, as
25 consideration for the receipt of, and as consideration for a promise and an agreement to
26 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
27 entrance to and maintaining and increasing their position in the enterprise, an enterprise
28 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

STEVE WILSON
a/k/a "Wolf"

1 and an unindicted co-conspirator, did unlawfully and knowingly commit the crime of
2 assault with a dangerous weapon on Randy Minor, in violation of California Penal Code
3 Sections 245(a)(2).

4 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

5 **COUNT SEVENTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in
6 Aid of Racketeering)

7 The defendant named below committed the following violent crime in aid of
8 racketeering activity:

9 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
10 fully described in Count Two of this Indictment, which are re-alleged and incorporated by
11 reference as though set forth fully herein, constituted an enterprise as defined in Title 18,
12 United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact
13 which was engaged in, and the activities of which affected, interstate and foreign
14 commerce.

15 (2) At all times relevant to this Indictment, the above-described enterprise,
16 through its members and associates, engaged in racketeering activity as defined in Title
17 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
18 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
19 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
20 841 and 846, and acts involving murder, in violation of California Penal Code Sections
21 187(a), 189 and 664.

22 (3) On or about August 26, 2004, in the Northern District of California, as
23 consideration for the receipt of, and as consideration for a promise and an agreement to
24 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
25 entrance to and maintaining and increasing their position in the enterprise, an enterprise
26 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

27
28 **STEVE WILSON**
a/k/a "Wolf"

1 and an unindicted co-conspirator, did unlawfully and knowingly assault with a dangerous
 2 weapon Pedro Raigoza, in violation of California Penal Code Section 245(a)(2).
 3

4 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

5 **COUNT EIGHTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in
 6 Aid of Racketeering)

7 The defendants named below committed the following violent crime in aid of
 8 racketeering activity:

9 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
 10 fully described in Paragraph D of Count One and Count Two of this Indictment, which
 11 are re-alleged and incorporated by reference as though set forth fully herein, constituted
 12 an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a
 13 group of individuals associated in fact which was engaged in, and the activities of which
 14 affected, interstate and foreign commerce.

15 (2) At all times relevant to this Indictment, the above-described enterprise,
 16 through its members and associates, engaged in racketeering activity as defined in Title
 17 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
 18 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
 19 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
 20 841 and 846, and acts involving murder, in violation of California Penal Code Sections
 21 187(a), 189 and 664.

22 (3) On or about and between August 23, 2004 and August 26, 2004, in the
 23 Northern District of California, as consideration for the receipt of, and as consideration
 24 for a promise and an agreement to pay, anything of pecuniary value from the enterprise,
 25 and for the purpose of gaining entrance to and maintaining and increasing their position
 26 in the enterprise, an enterprise engaged in racketeering activity, as set forth more fully in
 27 Count Two of this Indictment,

28
**RAYMON D. HILL
 a/k/a "Money Ray,"
 LESTER W. HOGAN**

1 **a/k/a "Styles,"**

2 and an unindicted co-conspirator, unlawfully and knowingly conspired to murder Travis
 3 Trammel, in violation of California Penal Code Sections 182 and 187.

4 In furtherance of this conspiracy and to effect the object thereof, **RAYMON D.**
 5 **HILL, a/k/a "Money Ray" and LESTER W. HOGAN, a/k/a "Styles,"** and co-
 6 conspirators not indicted herein committed the following overt acts in the Northern
 7 District of California:

- 8 (1) On August 24, 2004, Lester W. Hogan armed himself with a handgun;
 9 (2) On August 25, 2004, Lester W. Hogan armed himself with a handgun.

10 All in violation of Title 18, United States Code, Sections 1959(a)(5).

11 **COUNT NINETEEN:** (Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) --
 12 Possession with Intent to Distribute Cocaine Base)

13 On or about March 26, 2002, in the Northern District of California, the defendant

14 **AQUIL H. PETERSON**
 15 **a/k/a "Quil"**

16 knowingly and intentionally distributed a Schedule II controlled substance, to wit,
 17 approximately 0.23 grams of cocaine base, in violation of Title 21, United States Code,
 18 Sections 841(a)(1) & (b)(1)(C).

19 **COUNT TWENTY:** (Title 21, United States Code, Section 860(a) – Possession for
 20 Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a Public
 21 Housing Facility and a Playground)

22 On or about March 26, 2002, in the Northern District of California, the defendant

23 **AQUIL H. PETERSON**
 24 **a/k/a "Quil"**

25 knowingly violated Title 21, United States Code, Section 841(a)(1) by distributing and
 26 possessing with the intent to distribute cocaine base, within one thousand feet of a public
 27 elementary school, and a housing facility owned by a public housing authority, and a
 28 playground, in violation of Title 21, United States Code, Section 860(a).

COUNT TWENTY-ONE: (Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C) – Possession with Intent to Distribute Cocaine Base)

On or about August 9, 2002, in the Northern District of California, the defendant

MISTER MEILLEUR a/k/a "Mister"

knowingly and intentionally possessed with intent to distribute a Schedule II controlled substance, to wit, approximately 4.52 grams of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(C).

COUNT TWENTY-TWO: (Title 21, United States Code, Section 860(a) – Possession for Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a Public Housing Facility and a Playground)

On or about August 9, 2002, in the Northern District of California, the defendant

MISTER MEILLEUR a/k/a "Mister"

knowingly violated Title 21, United States Code, Section 841(a)(1) by possessing with the intent to distribute cocaine base within one thousand feet of a public elementary school, and a housing facility owned by a public housing authority, and a playground, in violation of Title 21, United States Code, Section 860(a).

COUNT TWENTY-THREE: (Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B)(iii) – Possession with Intent to Distribute Cocaine Base)

On or about August 24, 2002, in the Northern District of California, the defendant

**AQUIL H. PETERSON
a/k/a "Quil"**

knowingly and intentionally possessed with intent to distribute a Schedule II controlled substance, to wit, approximately 30.73 grams of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) & (b)(1)(B)(iii).

COUNT TWENTY-FOUR: (Title 21, United States Code, Section 860(a) – Possession for Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a Public Housing Facility and a Playground)

1 On or about August 24, 2002, in the Northern District of California, the defendant
2

3 **AQUIL H. PETERSON**
4 a/k/a "Quil"

5 knowingly violated Title 21, United States Code, Section 841(a)(1) by possessing with the
6 intent to distribute cocaine base within one thousand feet of a public elementary school,
7 and a housing facility owned by a public housing authority, and a playground, in violation
8 of Title 21, United States Code, Section 860(a).

9 **COUNT TWENTY-FIVE:** (Title 21, United States Code, Sections 841(a)(1) &
10 (b)(1)(B)(iii) – Possession with Intent to Distribute Cocaine Base)

11 On or about August 31, 2002, in the Northern District of California, the defendant
12

13 **DENNIS CYRUS, Jr.,**
14 a/k/a "Daddy-O"

15 knowingly and intentionally possessed with intent to distribute a Schedule II controlled
16 substance, to wit, approximately 5.88 grams of cocaine base, in violation of Title 21,
17 United States Code, Sections 841(a)(1) & (b)(1)(B)(iii).

18 **COUNT TWENTY-SIX:** (Title 21, United States Code, Section 860(a) – Possession for
19 Distribution of Cocaine Base Within 1,000 Feet of a Public Elementary School, a Public
20 Housing Facility and a Playground)

21 On or about August 31, 2002, in the Northern District of California, the defendant
22

23 **DENNIS CYRUS, Jr.,**
24 a/k/a "Daddy-O"

25 knowingly violated 21 U.S.C. § 841(a)(1) by possessing with the intent to distribute
26 cocaine base, within one thousand feet of a public elementary school, and a housing
27 facility owned by a public housing authority, and a playground, in violation of Title 21,
28 United States Code, Section 860(a).

COUNTS TWENTY-SEVEN TO THIRTY-FOUR: (18 U.S.C. § 924(c)(1)(A)(i) –
 Using, Carrying and Possessing Firearm During and in Relation to Crime of Violence)

 (1) On or about the dates set forth below, in the Northern District of California,

1 the defendants named below did possess a firearm while committing the specified crimes
 2 of violence as set forth in the specified counts of this indictment which are re-alleged and
 3 incorporated by reference as if fully set forth herein:

<u>CT</u>	<u>DATE</u>	<u>DEFENDANT(S)</u>	<u>PREDICATE VICAR OFFENSE(S)</u>	<u>FOUND IN COUNT(S)</u>
27	9/29/01	LESTER W. HOGAN	18 U.S.C. § 1959 (Victim: Terrell Trammell)	4, 5
28	7/28/02	DENNIS CYRUS, Jr.	18 U.S.C. § 1959 (Victim: Marcus Atkinson)	6, 7
29	8/23/02	DENNIS CYRUS, Jr., AQUIL PETERSON	18 U.S.C. § 1959 (Victim: Joseph Hearns)	8
30	8/31/02	DENNIS CYRUS, Jr.	18 U.S.C. § 1959 (Victim: Randy Mitchell)	10
31	9/08/02	DENNIS CYRUS, Jr.	18 U.S.C. § 1959 (Victim: Ray Jimmerson)	11
32	8/23-26/04	STEVE WILSON	18 U.S.C. § 1959 (Victim: Randy Minor)	14-16
33	8/26/04	STEVE WILSON	18 U.S.C. § 1959 (Victim: Pedro Raigoza)	17
34	8/23-26/04	LESTER W. HOGAN	18 U.S.C. § 1959 (Victim: Travis Trammell)	18

21
 22 **COUNT THIRTY-FIVE:** (Title 18, United States Code, Section 1503(a) – Obstruction
 23 of Justice)

24 On or about June 14, 2004, in the Northern District of California, the defendant,

25
 26 **RAYMON D. HILL,
 a/k/a "Money Ray"**

27 corruptly endeavored to influence, obstruct and impede the due administration of justice
 28 in a proceeding before a United States Magistrate Judge, to wit: a hearing in which the

defendant requested temporary release from custody before the Honorable James Larson,
in the matter of United States v. Raymon D. Hill, CR 03-0060 MJJ.

1. Specifically, RAYMON D. HILL represented to United States Magistrate Judge James Larson that he wished to be released to attend the funeral services and view the body of his deceased brother Eugene Hill, an immediate family member, when he knew that Eugene Hill was not his brother nor a member of his immediate family, in violation of Title 18, United States Code, Section 1503(a).

Notice of Special Findings

1. DENNIS CYRUS, a/k/a "Daddy-O"

a. The allegations set forth in Counts Eight, Ten, and Eleven, of this Indictment are hereby realleged as if fully set forth herein and incorporated by reference.

b. As to Counts Ten and Eleven of this Indictment, the defendant, **DENNIS CYRUS**, a/k/a "Daddy-O,":

- (1) was more than 18 years of age at the time of the offense (Title 18, United States Code, Section 3591(a));
 - (2) intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));
 - (3) intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B));
 - (4) intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and
 - (5) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)); and

(6) in committing the offenses described in Counts Ten and Eleven of this Indictment, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)).

c. As to Count Eight of this Indictment, the defendant, **DENNIS CYRUS**,

a/k/a “Daddy-O,”:

(1) was more than 18 years of age at the time of the offense (Title 18, United States Code, Section 3591(a));

(2) intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));

(3) intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B));

(4) intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

(5) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)); and

(6) in committing the offense described in Count Eight of this Indictment, the defendant committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim (Title 18, United States Code, Section 3592(c)(6)).

2. AQUIL PETERSON a/k/a "Quil"

a. The allegations set forth in Count Eight of this Indictment are hereby realleged as if fully set forth herein and incorporated by reference.

1 b. As to Count Eight of this Indictment, the defendant, **AQUIL PETERSON**,
2 a/k/a "Quil,":

- 3 (1) was more than 18 years of age at the time of the offense (Title 18, United
4 States Code, Section 3591(a));
5 (2) intentionally killed the victim (Title 18, United States Code, Section
6 3591(a)(2)(A));
7 (3) intentionally inflicted serious bodily injury that resulted in the death of the
8 victim (Title 18, United States Code, Section 3591(a)(2)(B));
9 (4) intentionally participated in an act, contemplating that the life of a person
10 would be taken or intending that lethal force would be used in connection with a
11 person, other than one of the participants in the offense, and the victim died as a
12 direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
13 (5) intentionally and specifically engaged in an act of violence, knowing that
14 the act created a grave risk of death to a person, other than one of the participants
15 in the offense, such that participation in the act constituted reckless disregard for
16 human life and the victim died as a direct result of the act (Title 18, United States
17 Code, Section 3591(a)(2)(D)); and

(6) in committing the offense described in Count Eight of this Indictment, the defendant committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim (Title 18, United States Code, Section 3592(c)(6)).

DATED: 5/29/05

KEVIN V. RYAN
United States Attorney

EUMI L. CHOI
Chief, Criminal Division

(Approved as to form:

AUSA Andrew M. Scoble
AUSA Philip J. Kearney

A TRUE BILL

Shay C McDonald 5-24-05
FOREPERSON

1 (6) It was further part of the conspiracy that the defendants and co-conspirators
2 engaged in acts of violence, including murder, attempted murder, assault with firearms,
3 and threatened acts of violence to protect themselves, to eliminate rival sellers, to retaliate
4 for acts of violence against members of the conspiracy, to prevent potential witnesses
5 from cooperating with law enforcement agencies, to prevent potential witnesses from
6 testifying against members of the conspiracy at criminal proceedings, to conceal the
7 conspiracy from law enforcement authorities, to promote and perpetuate the conspiracy's
8 distribution operation and to enhance the conspiracy's reputation.

9 (7) It was further part of the conspiracy that its members took efforts to avoid
10 detection, investigation by law enforcement authorities and conviction for criminal
11 charges against any members of the conspiracy.

12 D. Overt Acts

13 In furtherance of the conspiracy and in order to effect the objects thereof, the
14 defendants, unindicted co-conspirators, and others both known and unknown to the Grand
15 Jury, in various combinations, directly and indirectly, within the Northern District of
16 California, committed overt acts, including, but not limited to, the following:

17 (1) On or about September 5, 1994, **RAYMON D. HILL, a/k/a "Money**
18 **Ray,"** attempted to rob United States currency from Shaunte Johnson, a/k/a Shaunte
19 Spruell.

20 (2) On January 11, 1995, an unindicted co-conspirator distributed
21 approximately 0.43 grams of cocaine base.

22 (3) On or about January 19, 1996, **DONALD J. ARMOUR, a/k/a "DJ,"**
23 possessed with intent to distribute approximately 21.85 grams of cocaine base.

24 (4) On March 18, 1997, an unindicted co-conspirator possessed with intent to
25 distribute approximately 5.72 grams of cocaine base.

26 (5) On or about March 20, 1997, **RAYMON D. HILL, a/k/a "Money Ray,"**
27 possessed with intent to distribute approximately 173.66 grams of cocaine base.

28 (6) On July 4, 1997, **STEVE WILSON, a/k/a "Wolf," a/k/a "Solo,"**

1 possessed with intent to distribute approximately 2.06 grams of cocaine base.

2 (7) On or about March 15, 1998, **DONALD J. ARMOUR, a/k/a "DJ,"**
3 possessed with intent to distribute approximately 9.68 grams of cocaine base.

4 (8) On or about December 30, 1998, **RAYMON D. HILL, a/k/a "Money**
5 **Ray,"** possessed with intent to distribute approximately 84.50 grams of marijauna.

6 (9) On or about July 12, 1999, an unindicted co-conspirator possessed with the
7 intent to distribute approximately 25.70 grams of cocaine base.

8 (10) On August 15, 1999, an unindicted co-conspirator possessed with intent to
9 distribute approximately 26.40 grams of marijuana and approximately 3.23 grams of
10 cocaine base.

11 (11) On January 5, 2000, within the Northern District of California, an
12 unindicted co-conspirator possessed with intent to distribute approximately 0.45 grams of
13 cocaine base.

14 (12) On January 5, 2000, **MISTER MEILLEUR, a/k/a "Mister,"** possessed
15 with intent to distribute and distributed approximately 0.84 grams of cocaine base.

16 (13) On or about January 4, 2001, **LESTER W. HOGAN, a/k/a "Styles,"**
17 possessed with intent to distribute approximately 5.24 grams of cocaine base.

18 (14) On February 10, 2001, an unindicted co-conspirator possessed with intent to
19 distribute and distributed approximately 0.51 grams of cocaine base.

20 (15) On March 5, 2001, an unindicted co-conspirator possessed with intent to
21 distribute approximately 0.68 grams of cocaine base.

22 (16) On or about July 14, 2001, **LESTER W. HOGAN, a/k/a "Styles,"**
23 possessed with intent to distribute approximately 0.25 grams of cocaine base.

24 (17) On September 29, 2001, **LESTER W. HOGAN, a/k/a "Styles,"** attempted
25 to murder and assaulted with a dangerous weapon causing serious bodily injury to, Terrell
26 Trammell, by shooting him with a firearm.

27 (18) On October 25, 2001, an unindicted co-conspirator possessed with intent to
28 distribute approximately 5.10 grams of cocaine base.

1 (19) On or about October 27, 2001, **MISTER MEILLEUR, a/k/a "Mister,"**
2 possessed with intent to distribute approximately 4.66 grams of cocaine base.

3 (20) On December 19, 2001, an unindicted co-conspirator possessed a
4 .38-caliber revolver.

5 (21) On March 26, 2002, **AQUIL H. PETERSON, a/k/a "Quil,"** distributed
6 approximately 0.23 grams of cocaine base.

7 (22) On July 28, 2002, **DENNIS CYRUS, Jr., a/k/a "Daddy-O,"** attempted to
8 murder Marcus Atkinson by shooting him with a 9-mm Sig Sauer semi-automatic pistol.

9 (23) On or about August 9, 2002, **MISTER MEILLEUR, a/k/a "Mister,"**
10 possessed with intent to distribute approximately 4.52 grams of cocaine base.

11 (24) On August 24, 2002, **AQUIL H. PETERSON, a/k/a "Quil,"** possessed
12 with intent to distribute approximately 31.04 grams of cocaine base.

13 (25) On August 31, 2002, **DENNIS CYRUS, Jr., a/k/a "Daddy-O"** murdered
14 Randy Mitchell by shooting him with a 9-mm Smith & Wesson semi-automatic pistol.

15 (26) On August 31, 2002, **DENNIS CYRUS, Jr., a/k/a "Daddy-O,"** possessed
16 with intent to distribute approximately 5.88 grams of cocaine base.

17 (27) On November 26, 2002, an unindicted co-conspirator possessed with intent
18 to distribute approximately 0.49 grams of cocaine base and 9.80 grams of marijuana.

19 (28) On February 8, 2003, an unindicted co-conspirator possessed with intent to
20 distribute approximately 6.58 grams of cocaine base.

21 (29) On or about February 21, 2003, **DONALD J. ARMOUR, a/k/a "DJ,"**
22 possessed a 9-mm Glock handgun, \$4000, a "Tangent" brand scale and plastic bags.

23 (30) On or about February 13, 2004, an unindicted co-conspirator possessed with
24 intent to distribute approximately 0.26 grams of cocaine base.

25 (31) On or about and between August 23, 2004 and August 26, 2004, **LESTER**
26 **W. HOGAN, a/k/a "Styles," RAYMON D. HILL, a/k/a "Money Ray,"** and an
27 unindicted co-conspirator, conspired to murder Travis Trammel.

28 (32) On August 26, 2004, **STEVE WILSON, a/k/a "Wolf," a/k/a "Solo,"** and

1 an unindicted co-conspirator, conspired to commit murder, attempted to murder and
2 assaulted with a dangerous weapon causing serious bodily injury to, Randy Minor, by
3 shooting him with a handgun.

4 (33) On August 26, 2004, STEVE WILSON, a/k/a "Wolf," a/k/a "Solo," and
5 an unindicted co-conspirator, assaulted with a dangerous weapon causing serious
6 bodily injury to, Pedro Raigoza, by shooting him with a handgun.

7 **COUNT TWO:** (18 United States Code, Section 1962(d) – Conspiracy to Participate in
8 a Racketeer Influenced and Corrupt Organization)

9 **RICO CONSPIRACY**

10 A. **The Enterprise**

11 (1) At all times relevant to this Indictment, the defendants, and others not
12 named in this Indictment, were members and associates of "PAGE STREET," sometimes
13 referred to as "PST," "778" or "Page Street Mob," a violent street gang that was based in
14 the Northern District of California, particularly in the Western Addition neighborhood in
15 the City and County of San Francisco and elsewhere. PAGE STREET, including its
16 leadership, membership and associates, constituted an "enterprise," as defined by Title 18,
17 United States Code, Section 1961(4) (hereinafter "the enterprise"), that is, a group of
18 individuals associated in fact. The enterprise constituted an ongoing organization whose
19 members functioned as a continuing unit for a common purpose of achieving the
20 objectives of the enterprise. This enterprise was engaged in, and its activities affected,
21 interstate and foreign commerce.

22 (2) At all times relevant to this Indictment, a principal goal of the enterprise
23 was to commit murders, attempted murders, and other acts of violence for the following
24 purposes, among others: enriching the enterprise and its members; creating, maintaining
25 and controlling a market place for the distribution of its controlled substances; enforcing
26 discipline among members of the enterprise; protecting the enterprise and its members
27 from detection, apprehension and prosecution by law enforcement; intimidating and
28 preventing persons from testifying as witnesses in criminal prosecutions against members

1 of the enterprise, and others; preventing, thwarting, and retaliating against acts of
 2 violence perpetrated by rivals against the enterprise and its members; retaliating against
 3 real and perceived threats to the general respect and reputation of the enterprise and
 4 members thereof in the community; and promoting and enhancing the reputation and
 5 standing of the enterprise and its members. It was a further goal of the enterprise to
 6 obtain money and other things of value through the trafficking of controlled substances,
 7 including cocaine base, marijuana, and ecstasy.

8 B. The RICO Conspiracy

9 (3) From in or about sometime in at least 1994, the exact date being unknown
 10 to the Grand Jury, and continuing thereafter up to and including in or about May 2005, in
 11 the Northern District of California and elsewhere, the defendants

12 **RAYMON D. HILL**
 13 a/k/a "Money Ray,"
 14 **DENNIS CYRUS, Jr.,**
 15 a/k/a "Daddy-O,"
 16 **AQUIL H. PETERSON**
 17 a/k/a "Quil,"
 18 **LESTER W. HOGAN**
 19 a/k/a "Styles,"
 20 **STEVE WILSON**
 21 a/k/a "Wolf," a/k/a "Solo,"

22 together with other persons known and unknown, being persons employed by and
 23 associated with PAGE STREET, an enterprise which engaged in, and the activities of
 24 which affected, interstate and foreign commerce, unlawfully, knowingly and intentionally
 25 combined, conspired, confederated and agreed with each other, and with persons known
 26 and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1962(d),
 27 that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of
 28 the enterprise through a pattern of racketeering activity, as that term is defined in Title 18,
 United States Code, Sections 1961(1) and 1961(5). The pattern of racketeering activity
 through which the defendants agreed to conduct the affairs of the enterprise consisted of
 the acts set forth below in Paragraph 4 of this Count of the Indictment.

29 C. The Pattern of Racketeering Activity

30 (4) The pattern of racketeering activity, as defined in Title 18, United States

1 Code, Sections 1961(1) and 1961(5) consists of the following acts:

2 **Racketeering Act 1**

3 From in or about some time no later than 1994, the exact date being unknown to
 4 the Grand Jury, and continuing thereafter up to and including April 2005, in the Northern
 5 District of California and elsewhere, the defendants, **RAYMON D. HILL, a/k/a "Money**
 6 **Ray," DENNIS CYRUS, Jr., a/k/a "Daddy-O," AQUIL H. PETERSON, a/k/a**
 7 **"Quil," LESTER W. HOGAN, a/k/a "Styles," STEVE WILSON, a/k/a "Wolf," a/k/a**
 8 **"Solo,"** and others known and unknown to the Grand Jury, did unlawfully, knowingly and
 9 intentionally combine, conspire, confederate and agree together, with each other, and
 10 with co-conspirators not indicted herein, to possess with intent to distribute and to
 11 distribute narcotic controlled substances, including a Schedule II controlled substance, to
 12 wit:

13 (1) Mixtures and substances containing a detectable amount of cocaine base, also
 14 known as crack cocaine, a Schedule II narcotic controlled substance, and the quantity of
 15 said mixtures and substances was fifty (50) grams or more, in violation of Title 21, United
 16 States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

17 (2) Mixtures and substances containing a detectable amount of cannabis, also
 18 known as marijuana, a Schedule I controlled substance, in violation of Title 21, United
 19 States Code, Section 841(a)(1).

20 (3) Mixtures and substances containing a detectable amount of ecstasy, a Schedule
 21 I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

22 **Racketeering Act 2**

23 On March 20, 1997, within the Northern District of California, PAGE STREET
 24 gang member **RAYMON D. HILL, a/k/a "Money Ray,"** possessed with intent to
 25 distribute approximately 173 grams of cocaine base, in violation of Title 21, United States
 26 Code, Section 841(a)(1).

27 **Racketeering Act 3**

28 On July 4, 1997, within the Northern District of California, PAGE STREET gang

1 member STEVE WILSON, a/k/a "Wolf," a/k/a "Solo," possessed with intent to
 2 distribute approximately 2.06 grams of cocaine base, in violation of Title 21, United
 3 States Code, Section 841(a)(1).

4 **Racketeering Act 4**

5 On February 6, 1998, within the Northern District of California, PAGE STREET
 6 gang member STEVE WILSON, a/k/a "Wolf," a/k/a "Solo," attempted to commit the
 7 murder of Mark Banks, in violation of California Penal Code Sections 664 and 187(a).

8 **Racketeering Act 5**

9 On December 30, 1998, within the Northern District of California, PAGE
 10 STREET gang member RAYMON D. HILL, a/k/a "Money Ray," possessed with intent
 11 to distribute approximately 84.5 grams of marijuana, in violation of Title 21, United
 12 States Code, Section 841(a)(1).

13 **Racketeering Act 6**

14 The defendants named below committed the following acts, any one of which
 15 alone constitutes the commission of Racketeering Act 6:

16 (A) Beginning on an unknown date in or about 2001, and continuing to September 29,
 17 2001, within the Northern District of California, PAGE STREET gang members
 18 RAYMON D. HILL, a/k/a "Money Ray," and LESTER W. HOGAN, a/k/a "Styles,"
 19 unlawfully and knowingly conspired to murder Terrell Trammell, in violation of
 20 California Penal Code Sections 182 and 187(a).

21 In furtherance of this conspiracy and to effect the object thereof, RAYMON D.
 22 HILL, a/k/a "Money Ray" and LESTER W. HOGAN, a/k/a "Styles," and co-
 23 conspirators not indicted herein, committed the following overt acts in the Northern
 24 District of California:

25 (1) On September 29, 2001, Lester W. Hogan armed himself with a handgun;
 26 (2) On September 29, 2001, Lester W. Hogan proceeded to the 300 block of
 27 Haight Street in San Francisco, California.

28 (B) On September 29, 2001, within the Northern District of California, RAYMON D.

1 **HILL, a/k/a "Money Ray," and LESTER W. HOGAN, a/k/a "Styles,"** unlawfully
2 attempted to murder Terrell Trammell, in violation of California Penal Code Sections 664
3 and 187(a).

4 **Racketeering Act 7**

5 On March 26, 2002, within the Northern District of California, PAGE STREET
6 gang member **AQUIL PETERSON, a/k/a "Quil,"** possessed with intent to distribute
7 and distributed approximately 0.23 grams of cocaine base, in violation of Title 21, United
8 States Code, Section 841(a)(1).

9 **Racketeering Act 8**

10 On July 28, 2002, within the Northern District of California, PAGE STREET gang
11 member **DENNIS CYRUS, Jr., a/k/a "Daddy-O,"** unlawfully attempted to murder
12 Marcus Atkinson, in violation of California Penal Code Sections 664 and 187(a).

13 **Racketeering Act 9**

14 The defendants named below committed the following acts, any of which alone
15 constitutes the commission of Racketeering Act 10:

16 (a) On August 23, 2002, within the Northern District of California, PAGE
17 STREET gang members **DENNIS CYRUS, Jr., a/k/a "Daddy-O," and AQUIL H.**
18 **PETERSON, a/k/a "Quil,"** did unlawfully murder, with malice aforethought, Joseph
19 Hearns by shooting him with a .44-caliber Desert Eagle semi-automatic pistol, in
20 violation of California Penal Code Section 187(a).

21 (b) On August 23, 2002, within the Northern District of California, PAGE
22 STREET gang members **DENNIS CYRUS, Jr., a/k/a "Daddy-O," and AQUIL H.**
23 **PETERSON, a/k/a "Quil,"** kidnaped Joseph Hearns, in violation of California Penal
24 Code Section 207(a).

25 **Racketeering Act 10**

26 On August 24, 2002, within the Northern District of California, PAGE STREET
27 gang member **AQUIL H. PETERSON, a/k/a "Quil,"** possessed with intent to distribute
28 approximately 31.04 grams of cocaine base, in violation of Title 21, United States Code,

1 Section 841(a)(1).

2 **Racketeering Act 11**

3 On August 31, 2002, within the Northern District of California, PAGE STREET
 4 gang member **DENNIS CYRUS, Jr., a/k/a “Daddy-O,”** unlawfully murdered Randy
 5 Mitchell with malice aforethought, in violation of California Penal Code Section 187(a).

6 **Racketeering Act 12**

7 On August 31, 2002, within the Northern District of California, PAGE STREET
 8 gang member **DENNIS CYRUS, Jr., a/k/a “Daddy-O,”** possessed with intent to
 9 distribute approximately 5.88 grams of cocaine base, in violation of Title 21, United
 10 States Code, Section 841(a)(1).

11 **Racketeering Act 13**

12 On September 8, 2002, within the Northern District of California, PAGE STREET
 13 gang member **DENNIS CYRUS, Jr., a/k/a “Daddy-O,”** did unlawfully murder Ray
 14 Jimmerson, with malice aforethought, in violation of California Penal Code Section
 15 187(a).

16 **Racketeering Act 14**

17 The defendants below, committed the following acts, anyone of which alone,
 18 constitute the commission of Racketeering Act 14:

19 (A) Beginning on an unknown date no later than August 23, 2004, and continuing
 20 through August 26, 2004, within the Northern District of California, PAGE STREET
 21 gang members **STEVE WILSON, a/k/a “Wolf,” a/k/a “Solo,” RAYMON D. HILL,**
 22 **a/k/a “Money Ray” and LESTER W. HOGAN, a/k/a “Styles,”** and an unindicted co-
 23 conspirator, unlawfully conspired to murder Randy Minor, in violation of California
 24 Penal Code Sections 182 and 187(a).

25 In furtherance of this conspiracy and to effect the object thereof, **STEVE**
 26 **WILSON, a/k/a “Wolf,” a/k/a “Solo,” RAYMON D. HILL, a/k/a “Money Ray” and**
 27 **LESTER W. HOGAN, a/k/a “Styles,”** and co-conspirators not indicted herein
 28 committed the following overt acts in the Northern District of California:

1 (1) On or about August 23, 2004, **RAYMON D. HILL** conversed with
 2 **LESTER W. HOGAN** and encouraged **LESTER W. HOGAN** to locate and murder
 3 Randy Minor;

4 (2) On August 26, 2004, **STEVE WILSON** armed himself with a handgun and
 5 drove with an unindicted co-conspirator to the 500 Block of Haight Street in San
 6 Francisco, California.

7 (B) On August 26, 2004, within the Northern District of California, **PAGE**
 8 **STREET** gang member **STEVE WILSON**, a/k/a "Wolf," a/k/a "Solo," and an
 9 unindicted co-conspirator, unlawfully attempted to murder Randy Minor, in violation of
 10 California Penal Code Sections 664 and 187(a).

11 (C) On August 26, 2004, within the Northern District of California, **PAGE**
 12 **STREET** gang member **STEVE WILSON**, a/k/a "Wolf," a/k/a "Solo," and an
 13 unindicted co-conspirator, unlawfully attempted to murder Pedro Raigoza, in violation of
 14 California Penal Code Sections 664 and 187(a).

15 Racketeering Act 15

16 On or about and between August 23, 2004 and August 26, 2004, within the
 17 Northern District of California, **PAGE STREET** gang members **LESTER W. HOGAN**,
 18 a/k/a "Styles," **RAYMON D. HILL**, a/k/a "Money Ray," and an unindicted co-
 19 conspirator, conspired to murder Travis Trammel, with malice aforethought, in violation
 20 of California Penal Code Sections 182 and 187(a).

21 In furtherance of this conspiracy and to effect the object thereof, **RAYMON D.**
 22 **HILL**, a/k/a "Money Ray" and **LESTER W. HOGAN**, a/k/a "Styles," and co-
 23 conspirators not indicted herein, committed the following overt acts in the Northern
 24 District of California:

25 (1) On August 24, 2004, **LESTER W. HOGAN**, a/k/a "Styles," armed
 26 himself with a handgun;

27 (2) On August 25, 2004, **LESTER W. HOGAN**, a/k/a "Styles," armed
 28 himself with a handgun.

1 **COUNT THREE:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid
2 of Racketeering)

3 The defendants named below committed the following violent crime in aid of
4 racketeering activity:

5 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
6 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and
7 incorporated by reference as though set forth fully herein, constituted an enterprise as
8 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals
9 associated in fact which was engaged in, and the activities of which affected, interstate
10 and foreign commerce.

11 (2) At all times relevant to this Indictment, the above-described enterprise,
12 through its members and associates, engaged in racketeering activity as defined in Title
13 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
14 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
15 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
16 841 and 846, and acts involving murder, in violation of California Penal Code Sections
17 182, 187(a), 664 and 189.

**RAYMOND D. HILL
a/k/a "Money Ray," and
LESTER W. HOGAN
a/k/a "Styles,"**

unlawfully and knowingly conspired to murder Terrell Trammell, in violation of California Penal Code Sections 182 and 187(a).

In furtherance of this conspiracy and to effect the object thereof, RAYMOND D. HILL, a/k/a "Money Ray" and LESTER W. HOGAN, a/k/a "Styles," and co-

1 conspirators not indicted herein committed the following overt acts in the Northern
2 District of California:

- 3 (1) On September 29, 2001, Lester W. Hogan armed himself with a handgun;
4 (2) On September 29, 2001, Lester W. Hogan proceeded to the 300 block of
5 Haight Street in San Francisco, California.

6 All in violation of Title 18, United States Code, Section 1959(a)(5).

7 **COUNT FOUR:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid of
8 Racketeering)

9 The defendants named below committed the following violent crime in aid of
10 racketeering activity:

11 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
12 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and
13 incorporated by reference as though set forth fully herein, constituted an enterprise as
14 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals
15 associated in fact which was engaged in, and the activities of which affected, interstate
16 and foreign commerce.

17 (2) At all times relevant to this Indictment, the above-described enterprise,
18 through its members and associates, engaged in racketeering activity as defined in Title
19 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
20 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
21 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
22 841 and 846, and acts involving murder, in violation of California Penal Code Sections
23 187(a), 182 and 664.

24 (3) On or about September 29, 2001, in the Northern District of California, as
25 consideration for the receipt of, and as consideration for a promise and an agreement to
26 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
27 entrance to and maintaining and increasing their position in the enterprise, an enterprise
28

engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

**RAYMOND D. HILL
a/k/a "Money Ray," and
LESTER W. HOGAN
a/k/a "Styles,"**

unlawfully and knowingly attempted to murder, Terrell Trammell, in violation of California Penal Code Sections 187(a) and 664.

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(5).

COUNT FIVE: (Title 18, United States Code, Section 1959 – Violent Crime in Aid of Racketeering)

The defendants named below committed the following violent crime in aid of racketeering activity:

(1) At all times relevant to this Indictment, the racketeering enterprise, as more fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce.

(2) At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, and acts involving murder, in violation of California Penal Code Sections 187(a), 182 and 664.

(3) On or about September 29, 2001, in the Northern District of California, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing their position in the enterprise, an enterprise

engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

RAYMOND D. HILL
a/k/a "Money Ray," and
LESTER W. HOGAN
a/k/a "Styles,"

unlawfully and knowingly assaulted Terrell Trammell with a dangerous weapon, in violation of California Penal Code Section 245(a)(2).

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT SIX: (Title 18, United States Code, Section 1959 – Violent Crime in Aid of Racketeering)

The defendant named below committed the following violent crime in aid of racketeering activity:

(1) At all times relevant to this Indictment, the racketeering enterprise, as more fully described in Paragraph A of Count Two Indictment, which is re-alleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce.

(2) At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, and acts involving murder, in violation of California Penal Code Sections 187(a), 189 and 664.

(3) On or about July 28, 2002, in the Northern District of California, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise

1 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

2 **DENNIS CYRUS, Jr., a/k/a "Daddy-O,"**

3 and an unindicted co-conspirator did, unlawfully and knowingly attempt to murder,

4 Marcus Atkinson, in violation of California Penal Code Sections 187(a) and 664.

5 All in violation of Title 18, United States Code, Section 1959(a)(5).

6 **COUNT SEVEN:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid of
7 Racketeering)

8 The defendant named below committed the following violent crime in aid of
9 racketeering activity:

10 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
11 fully described in Paragraph A of Count Two this Indictment, which is re-alleged and
12 incorporated by reference as though set forth fully herein, constituted an enterprise as
13 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals
14 associated in fact which was engaged in, and the activities of which affected, interstate
15 and foreign commerce.

16 (2) At all times relevant to this Indictment, the above-described enterprise,
17 through its members and associates, engaged in racketeering activity as defined in Title
18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
19 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
20 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
21 841 and 846, and acts involving murder, in violation of California Penal Code Sections
22 187(a), 189 and 664.

23 (3) On or about July 28, 2002, in the Northern District of California, as
24 consideration for the receipt of, and as consideration for a promise and an agreement to
25 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
26 entrance to and maintaining and increasing his position in the enterprise, an enterprise
27 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

28 **DENNIS CYRUS, Jr., a/k/a "Daddy-O,"**

1 and an unindicted co-conspirator did, unlawfully and knowingly , assault with a
2 dangerous weapon Marcus Atkinson, in violation of California Penal Code Sections
3 245(a)(2).

4 All in violation of Title 18, United States Code, Section 1959(a)(3).

5 **COUNT EIGHT:** (Title 18, United States Code, Section 1959 – Violent Crime In Aid
6 Of Racketeering).

7 The defendants named below committed the following violent crime in aid of
8 racketeering activity:

9 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
10 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and
11 incorporated by reference as though set forth fully herein, constituted an enterprise as
12 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals
13 associated in fact which was engaged in, and the activities of which affected, interstate
14 and foreign commerce.

15 (2) At all times relevant to this Indictment, the above-described enterprise,
16 through its members and associates, engaged in racketeering activity as defined in Title
17 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
18 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
19 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
20 841 and 846, and acts involving murder, in violation of California Penal Code Sections
21 187(a), 189 and 664.

22 (3) On or about August 23, 2002, in the Northern District of California, as
23 consideration for the receipt of, and as consideration for a promise and an agreement to
24 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
25 entrance to and maintaining and increasing their position in the enterprise, an enterprise
26 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

27 **DENNIS CYRUS, Jr.,
a/k/a “Daddy-O,” and
AQUIL H. PETERSON
a/k/a “Quil,”**

1 and others unknown to the Grand Jury, did unlawfully and knowingly murder Joseph
2 Hearns, in violation of California Penal Code Sections 187(a).

3 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

4 **COUNT NINE:** (Title 18, United States Code, Section 1959 – Violent Crime In Aid
5 Of Racketeering).

6 The defendants named below committed the following violent crime in aid of
7 racketeering activity:

8 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
9 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and
10 incorporated by reference as though set forth fully herein, constituted an enterprise as
11 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals
12 associated in fact which was engaged in, and the activities of which affected, interstate
13 and foreign commerce.

14 (2) At all times relevant to this Indictment, the above-described enterprise,
15 through its members and associates, engaged in racketeering activity as defined in Title
16 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
17 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
18 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
19 841 and 846, and acts involving murder, in violation of California Penal Code Sections
20 187(a), 189 and 664.

21 (3) On or about August 23, 2002, in the Northern District of California, as
22 consideration for the receipt of, and as consideration for a promise and an agreement to
23 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
24 entrance to and maintaining and increasing their position in the enterprise, an enterprise
25 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

26 **DENNIS CYRUS, Jr.,**
27 **a/k/a “Daddy-O,” and**
28 **AQUIL H. PETERSON**
a/k/a “Quil,”

1 and others unknown to the Grand Jury, unlawfully and knowingly kidnaped Joseph
 2 Hearns, in violation of California Penal Code Sections 207(a).

3 All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

4 **COUNT TEN:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid of
 5 Racketeering)

6 The defendant named below committed the following violent crime in aid of
 7 racketeering activity:

8 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
 9 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and
 10 incorporated by reference as though set forth fully herein, constituted an enterprise as
 11 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals
 12 associated in fact which was engaged in, and the activities of which affected, interstate
 13 and foreign commerce.

14 (2) At all times relevant to this Indictment, the above-described enterprise,
 15 through its members and associates, engaged in racketeering activity as defined in Title
 16 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
 17 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
 18 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
 19 841 and 846, and acts involving murder, in violation of California Penal Code Sections
 20 187(a), 189 and 664.

21 (3) On or about August 31, 2002, in the Northern District of California, as
 22 consideration for the receipt of, and as consideration for a promise and an agreement to
 23 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
 24 entrance to and maintaining and increasing their position in the enterprise, an enterprise
 25 engaged in racketeering activity, as set forth more fully Count Two of this Indictment,

26 **DENNIS CYRUS, Jr.,**
 27 **a/k/a “Daddy-O,”**

28 did unlawfully and knowingly murder Randy Mitchell, in violation of California Penal

1 Code Section 187(a).

2 All in violation of Title 18, United States Code, Section 1959(a)(1).

3 **COUNT ELEVEN:** (Title 18, United States Code, Section 1959 – Violent Crime in Aid
4 of Racketeering)

5 The defendant named below committed the following violent crime in aid of
6 racketeering activity:

7 (1) At all times relevant to this Indictment, the racketeering enterprise, as more
8 fully described in Paragraph A of Count Two of this Indictment, which is re-alleged and
9 incorporated by reference as though set forth fully herein, constituted an enterprise as
10 defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals
11 associated in fact which was engaged in, and the activities of which affected, interstate
12 and foreign commerce.

13 (2) At all times relevant to this Indictment, the above-described enterprise,
14 through its members and associates, engaged in racketeering activity as defined in Title
15 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
16 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
17 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
18 841 and 846, and acts involving murder, in violation of California Penal Code Sections
19 187(a), 189 and 664.

20 (3) On or about September 8, 2002, in the Northern District of California, as
21 consideration for the receipt of, and as consideration for a promise and an agreement to
22 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
23 entrance to and maintaining and increasing their position in the enterprise, an enterprise
24 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

25 **DENNIS CYRUS, Jr.,**
26 **a/k/a “Daddy-O,”**

27 did unlawfully and knowingly murder Ray Jimmerson, in violation of California Penal
28 Code Section 187(a).

1 All in violation of Title 18, United States Code, Section 1959(a)(1).

2 **COUNT TWELVE:** (18 United States Code, Sections 1512(a)(1)(A) & (C) – Witness
3 Murder)

4 On or about September 8, 2002, in the Northern District of California, the
5 defendant,

6 **DENNIS CYRUS, Jr.,
7 a/k/a “Daddy-O,”**

8 killed Ray Jimmerson, with intent to prevent his attendance and testimony in an official
9 proceeding and to prevent communication by him to a law enforcement officer and judge
10 of the United States of information relating to the commission or possible commission of
11 a Federal offense, in violation of Title 18, United States Code, Sections 1512(a)(1)(A) &
12 (C).

13 **COUNT THIRTEEN:** (18 United States Code, Sections 1513(a)(1)(A) & (B) – Witness
14 Retaliation)

15 On or about September 8, 2002, in the Northern District of California, the
16 defendant,

17 **DENNIS CYRUS, Jr.,
18 a/k/a “Daddy-O,”**

19 killed Ray Jimmerson, with intent to retaliate against Ray Jimmerson for his attendance
20 as a witness at an official proceeding, for his testimony given in an official proceeding,
21 and for providing to a law enforcement officer information relating to the commission
22 and possible commission of a Federal offense, in violation of Title 18, United States
23 Code, Sections 1513(a)(1)(A) & (B).

24 **COUNT FOURTEEN:** (Title 18, United States Code, Section 1959 – Violent Crime in
25 Aid of Racketeering)

26 The defendants named below committed the following violent crime in aid of
27 racketeering activity:

28 (1) At all times relevant to this Indictment, the racketeering enterprise, as more

1 fully described in Count Two of this Indictment, which is realleged and incorporated by
2 reference as though set forth fully herein, constituted an enterprise as defined in Title 18,
3 United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact
4 which was engaged in, and the activities of which affected, interstate and foreign
5 commerce.

6 (2) At all times relevant to this Indictment, the above-described enterprise,
7 through its members and associates, engaged in racketeering activity as defined in Title
8 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the
9 felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise
10 dealing in a controlled substance, in violation of Title 21, United States Code, Sections
11 841 and 846, and acts involving murder, in violation of California Penal Code Sections
12 187(a), 189 and 664.

13 (3) Beginning on an unknown date no later than August 23, 2004, and
14 continuing to on or about August 26, 2004, in the Northern District of California, as
15 consideration for the receipt of, and as consideration for a promise and an agreement to
16 pay, anything of pecuniary value from the enterprise, and for the purpose of gaining
17 entrance to and maintaining and increasing their position in the enterprise, an enterprise
18 engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

**RAYMON D. HILL
a/k/a "Money Ray,"
LESTER W. HOGAN
a/k/a "Styles,"
STEVE WILSON
a/k/a "Wolf"**

23 and an unindicted co-conspirator, did unlawfully and knowingly conspire to murder
24 Randy Minor, in violation of California Penal Code Sections 182 and 187(a).

25 In furtherance of this conspiracy and to effect the object thereo, **RAYMON D.**
26 **HILL, a/k/a "Money Ray," LESTER W. HOGAN, a/k/a "Styles," and STEVE**
27 **WILSON, a/k/a/ "Wolf" or "Solo,"** and co-conspirators not indicted herein committed
28 the following overt acts in the Northern District of California:

(1) On August 26, 2004, STEVE WILSON armed himself with a handgun;
(2) On August 26, 2004, STEVE WILSON proceeded to the 500 block of

Haight Street in San Francisco, California.

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT FIFTEEN: (Title 18, United States Code, Section 1959 – Violent Crime in Aid of Racketeering)

The defendant named below committed the following violent crime in aid of racketeering activity:

(1) At all times relevant to this Indictment, the racketeering enterprise, as more fully described in Count Two of this Indictment, which are re-alleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce.

(2) At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, or otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 841 and 846, and acts involving murder, in violation of California Penal Code Sections 187(a), 189 and 664.

(3) On or about August 26, 2004, in the Northern District of California, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing their position in the enterprise, an enterprise engaged in racketeering activity, as set forth more fully in Count Two of this Indictment,

**STEVE WILSON
a/k/a "Wolf"**